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A COPY OF THE ATTACHED COMMENTS REF: NPRM 8218 WAS MAILED TO THE AMERICAN RADIO RELAY LEAGUE, 225 MAIN STREET, NEWINGTON, CT USA 06111 ON MAY 12, 1993

JOHN S. HILL, NJØM MAY 12, 1993

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I AM WRITING YOU THIS LETTER TO SPEAK OUT IN OPPOSITION TO THE NRPM-8218. THE PETITION BY THE ARRL FOR AUTOMATIC DIGITAL OPERATION. I HAVE BEEN ACTIVE IN HF DIGITAL COMMUNICATIONS SINCE 1985. IN THAT TIME, I HAVE HAD OVER 1,000 CONTACTS USING BAUDOT (RTTY). UNLIKE PACKET, IT IS A MODE VERY WELL SUITED FOR HF OPERATION. THE ARRL HAS FAILED TO PROVIDE ANY RESULTS OF IT'S OVER EXTENDED S.T.A. FOR AUTOMATED PACKET THAT PROVE IT TO BE A SPECTRALLY EFFICIENT MODE. ALL ONE NEEDS TO DO TO PROVE IT'S INNEFICIENCY IS TUNE IN ONE OF THESE LINKS AND OBSERVE THE COUNTLESS REPEATING OF DATA. THIS IS NOT A NEW PROBLEM! PACKET IS BETTER IMPLEMENTED ON THE VHF AND UHF LINKED NETWORKS WHICH EXIST ACROSS THE U.S.

MOST OF MY CONTACTS ARE WITH WEAK SIGNAL STATIONS. THEY ABOUND ACROSS THE DIGITAL SUB BANDS. AUTOMATED STATIONS WILL SUDDENLY BEGIN TRANSMITTING RIGHT ON TOP OF A CONTACT IN PROGRESS IF THEY CANT COPY YOU OR YOUR WEAK SIGNAL COUNTERPART. TIME WAS WHEN COMMON COURTESY PREVAILED AND FREQUENCIES WERE MANAGED ON A FIRST COME FIRST SERVED BASIS. BELIEVE ME WHEN I TELL YOU, AN UNMANNED COMPUTER KNOWS NO SUCH THING AS COURTESY.

I ALSO ENJOY OPERATING IN THE RTTY CONTESTS. DURING CONTEST PERIODS, THE RTTY BAND IS SO CROWDED ALREADY THAT COMMUNICATING IS DIFFICULT. EVEN UNDER THOSE CONDITIONS, ONE CAN STILL ACCOMPLISH DATA TRANSFER RATES WELL IN EXCESS OF PACKET, AMTOR, OR PACTOR. FURTHER REDUCTION OF THE RTTY PORTION OF THE DIGITAL SUB BANDS WOULD SOUND THE DEATH KNELL FOR US CONTESTORS.

RTTY OPERATING HAS PROVIDED ME WITH COUNTLESS HOURS OF ENJOYMENT. THE ARRL PLAN WOULD SERIOUSLY HAMPER MY ABILITY TO CONTINUE TO ENJOY THIS MODE DUE TO OVER CROWDING AND NO PROTECTION FROM AUTOMATED BURST MODES (PACKET, AMTOR, PACTOR) INTERFERENCE. FOR REASONS THAT ELUDE ME, THE ARRL HAS CHOSEN TO DISREGARD THE RESULTS OF A POLL IT CONDUCTED AMONGST THE DIGITAL COMMUNITY.

